

I am opposed to relaxing media ownership rules further. I have personal experience as a PTA child advocate that the radio changes have already made it harder for that media to fulfill what most people would think of as its public information role on important issues, and that this is directly tied to the ownership relaxation. Details follow.

The media have public responsibilities as well as business ones, and we will all lose if those responsibilities are lessened or assigned farther away from our local communities. Media are already more into marketing than information as service as it is. Relaxing ownership rules has made radio worse in this respect not better, and relaxing them further will only make other media worse as well. Citing the Internet and other technologies as a substitute is erroneous at best and deliberately misleading at worst. These media show many advances and offer much but each medium has its own type and time of audience and is useful for different types of information. They do not substitute for one another. Further, most people need to get information multiple times in multiple ways at key times to help make decisions or make changes in their behavior. And, many populations have fragmented or segmented access to certain media. For all these reasons, when you need to reach *all publics* access to *all media* is crucial.

If radio and TV want to lessen their public service role and *only* be businesses like any other then they should pay for the spectrum they use. The rates should be very high to reflect the fact that spectrum is a limited and precious resource, and thus irreplaceable. Further, that larger owners have greater opportunities for revenue and should pay more not less.

I am a PTA council volunteer leader coordinating activities of 50+ PTAs serving more than 50,000 children in and around a small city. I have many examples of consolidation-related challenges but this is the most telling. Bus safety is very important to the community and the PTA. About two years ago a child died in a bus-related accident and we tried hard to get a multi-faceted media campaign rolling to prevent further injuries and increase safety overall. There were many stories about her death, the parents' anguish, the court case and the school system's policies. Very few about ways parents could make kids safer and what all drivers should do to prevent injuries and death. And, after her death was no longer news there was nothing.

Research and experience (including NTSB best practices) have shown repeatedly that for effectiveness bus safety messages must be multi-faceted and multi-media, must target all publics, and must include messages specific to that public at that time (i.e. car drivers- the cause of most bus-related injuries- must get the message, too, and it is most effective to tell them while they are driving). For this radio is a key component.

National PTA and its partners provide professionally produced spots in compatible formats and many other tools to make bus safety media relations easy, but compared a previous campaign before conglomeration this was much harder and with radio it was DOA. TV has fewer locally mediated slots but they did accept and play some

useful PSAs, though many were in the dead of night. The print media helped some. But radio did not participate. *All* local stations are owned by one of three conglomerates.

Not a single local radio station director would agree to run the PSAs at all, much less to run them in drive time. All said such decisions are no longer a local matter and must be taken up with folks far away. All said this is due to format and priority changes dictated by their corporate owners. Further, they all concurred that co-marketing of large moneymaking events is their primary service and is sufficient to fulfill their required service commitment. And, that they are usually uninterested in public information campaigns, even on issues with no controversy that are needed to save children's lives and decrease insurance costs for everyone. One station- out of more than 20- did have us on a locally produced talk show that tapes during the week and runs early Sunday mornings.

This was all a vast change from the last time we sponsored a coordinated campaign on this. Then we were able to easily get video and audio PSAs on all broadcast media at key times over a several month period.

This time, all said they would be glad to sell us time for thousands of dollars, or *might* be willing in the future to help us publicize an event to raise money if it would be used to buy time. It is a sad commentary that we *might* be able to get several media partners to publicize an event that after all the time, effort and expense might raise enough money to buy some spots, but do not see providing them as worthy of their service time commitment.

More deregulation will make these scenarios more common, not less. Having these decisions far away makes it impractical for local activists to even present a case to decision makers, and priority changes make it unlikely it will be effective. Why would you want to make that happen?